

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

JEFFREY A. LAWSON,

Plaintiff,

vs.

DETECTIVE ROBERT VERUCHI, Badge No. 167, named  
in his individual capacity, the CITY OF ROCKFORD, an  
Illinois Municipal Corporation, and RICHARD A. MEYERS,  
Named in his official capacity as Sheriff of Winnebago  
County, Illinois,

Defendants.

Case No.: 08 C 50079

**DEFENDANTS ROBERT VERUCHI AND CITY OF ROCKFORD'S  
ANSWER TO COMPLAINT**

NOW COME the Defendants, ROBERT VERUCHI and CITY OF ROCKFORD, an Illinois Municipal Corporation, by and through their attorneys, City of Rockford Department of Law, Patrick W. Hayes, Legal Director, and Kerry F. Partridge, City Attorney, and for their Answer to Complaint state the following:

1. These Defendants deny the allegations contained in paragraph 1 of Plaintiff's Complaint on the basis that said allegations consist of legal conclusions which require no response by way of pleading.

2. These Defendants deny the allegations contained in paragraph 2 of Plaintiff's Complaint on the basis that said allegations consist of legal conclusions which require no response by way of pleading.

3. These Defendants neither admit nor deny the allegations contained in paragraph 3 of Plaintiff's Complaint, but demand strict proof thereof.

4. These Defendants deny the allegations contained in paragraph 4 of Plaintiff's Complaint on the basis that said allegations consist of legal conclusions which require no response by way of pleading.

5. These Defendants admit the allegations contained in paragraph 5 of Plaintiff's Complaint.

6. These Defendants admit the allegations contained in paragraph 6 of Plaintiff's Complaint.

7. These Defendants deny the allegations contained in paragraph 7 of Plaintiff's Complaint.

8. These Defendants admit the allegations contained in paragraph 8 of Plaintiff's Complaint.

9. These Defendants admit the allegations contained in paragraph 9 of Plaintiff's Complaint.

10. These Defendants admit the allegations contained in paragraph 10 of Plaintiff's Complaint.

11. These Defendants deny the allegations contained in paragraph 11 of Plaintiff's Complaint.

12. These Defendants deny the allegations contained in paragraph 12 of Plaintiff's Complaint.

13. These Defendants admit the allegations contained in paragraph 13 of Plaintiff's Complaint.

14. These Defendants admit that Veruchi swore out a complaint against Jeffery A. Lawson, identifying his address in Dixon, and his birth date of January 4, 1965, but deny the remaining allegations contained in paragraph 14 of Plaintiff's Complaint.

15. These Defendants admit that on or about June 15, 2007, Veruchi sought and obtained an arrest warrant for Jeffery A. Lawson, but deny the remaining allegations contained in paragraph 15 of Plaintiff's Complaint.

16. These Defendants admit the allegations contained in paragraph 16 of Plaintiff's Complaint.

17. These Defendants admit that Jeffery A. Lawson did not live in Rockford, but deny the remaining allegations contained in paragraph 17 of Plaintiff's Complaint.

18. These Defendants neither admit nor deny the allegations contained in paragraph 18 of Plaintiff's Complaint, but demand strict proof thereof.

19. These Defendants neither admit nor deny the allegations contained in paragraph 19 of Plaintiff's Complaint, but demand strict proof thereof.

20. These Defendants neither admit nor deny the allegations contained in paragraph 20 of Plaintiff's Complaint, but demand strict proof thereof.

21. These Defendants admit the allegations contained in paragraph 21 of Plaintiff's Complaint.

22. These Defendants neither admit nor deny the allegations contained in paragraph 22 of Plaintiff's Complaint, but demand strict proof thereof.

23. These Defendants neither admit nor deny the allegations contained in paragraph 23 of Plaintiff's Complaint, but demand strict proof thereof.

24. These Defendants neither admit nor deny the allegations contained in paragraph 24 of Plaintiff's Complaint, but demand strict proof thereof.

25. These Defendants neither admit nor deny the allegations contained in paragraph 25 of Plaintiff's Complaint, but demand strict proof thereof.

26. These Defendants neither admit nor deny the allegations contained in paragraph 26 of Plaintiff's Complaint, but demand strict proof thereof.

27. These Defendants neither admit nor deny the allegations contained in paragraph 27 of Plaintiff's Complaint, but demand strict proof thereof.

28. These Defendants neither admit nor deny the allegations contained in paragraph 28 of Plaintiff's Complaint, but demand strict proof thereof.

29. These Defendants neither admit nor deny the allegations contained in paragraph 29 of Plaintiff's Complaint, but demand strict proof thereof.

30. These Defendants neither admit nor deny the allegations contained in paragraph 30 of Plaintiff's Complaint, but demand strict proof thereof.

31. These Defendants neither admit nor deny the allegations contained in paragraph 31 of Plaintiff's Complaint, but demand strict proof thereof.

32. These Defendants neither admit nor deny the allegations contained in paragraph 32 of Plaintiff's Complaint, but demand strict proof thereof.

33. These Defendants neither admit nor deny the allegations contained in paragraph 33 of Plaintiff's Complaint, but demand strict proof thereof.

34. These Defendants neither admit nor deny the allegations contained in paragraph 34 of Plaintiff's Complaint, but demand strict proof thereof.

35. These Defendants neither admit nor deny the allegations contained in paragraph 35 of Plaintiff's Complaint, but demand strict proof thereof.

36. These Defendants admit that on August 16, 2007, the charges against Jeffery A. Lawson were dismissed, but deny the remaining allegations of Paragraph 36 of Plaintiff's Complaint.

37. These Defendants deny the allegations contained in paragraph 37 of Plaintiff's Complaint.

**COUNT ONE**  
**Against Detective Veruchi - Title 42 U.S.C. 5 1983**

38. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 38 of Count I of Plaintiff's Complaint, as if fully re-written herein.

39. These Defendants deny the allegations contained in paragraph 39 of Plaintiff's Complaint.

40. These Defendants deny the allegations contained in paragraph 40 of Plaintiff's Complaint.

41. These Defendants deny the allegations contained in paragraph 41 of Plaintiff's Complaint.

42. These Defendants neither admit nor deny the allegations contained in paragraph 42 of Plaintiff's Complaint, but demand strict proof thereof.

43. These Defendants deny the allegations contained in paragraph 43 of Plaintiff's Complaint.

44. These Defendants deny the allegations contained in paragraph 44 of Plaintiff's Complaint.

**COUNT TWO**  
**Against City of Rockford - Title 42 U.S.C. 8 1983**

45. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 45 of Count II of Plaintiff's Complaint, as if fully re-written herein.

46. These Defendants deny the allegations contained in paragraph 46 of Plaintiff's Complaint.

47. These Defendants deny the allegations contained in paragraph 47 of Plaintiff's Complaint.

48. These Defendants deny the allegations contained in paragraph 48 of Plaintiff's Complaint.

49. These Defendants deny the allegations contained in paragraph 49 of Plaintiff's Complaint.

50. These Defendants deny the allegations contained in paragraph 50 of Plaintiff's Complaint.

**COUNT THREE**  
**Against defendant Meyers in his official capacity - Title 42 U.S.C. 8 1983**

51.-55. These Defendants make no responses to paragraphs 51-55 of Plaintiff's Complaint as these paragraphs are not directed against them.

**COUNT FOUR**  
**Against Defendant Veruchi - False Arrest/False Imprisonment**

56. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 56 of Count IV of Plaintiff's Complaint, as if fully re-written herein.

57. These Defendants deny the allegations contained in paragraph 57 of Plaintiff's Complaint.

58. These Defendants deny the allegations contained in paragraph 58 of Plaintiff's Complaint.

**COUNT FIVE**  
**Against Defendant Veruchi - Willful and Wanton Conduct**

59. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 59 of Count V of Plaintiff's Complaint, as if fully re-written herein.

60. These Defendants deny the allegations contained in paragraph 60 of Plaintiff's Complaint.

61. These Defendants deny the allegations contained in paragraph 61 of Plaintiff's Complaint.

62. These Defendants deny the allegations contained in paragraph 62 of Plaintiff's Complaint.

**COUNT SIX**  
**Against Defendant Veruchi - Malicious Prosecution**

63. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 63 of Count VI of Plaintiff's Complaint, as if fully re-written herein.

64. These Defendants deny the allegations contained in paragraph 64 of Plaintiff's Complaint.

65. These Defendants deny the allegations contained in paragraph 65 of Plaintiff's Complaint.

66. These Defendants deny the allegations contained in paragraph 66 of Plaintiff's Complaint.

67. These Defendants deny the allegations contained in paragraph 67 of Plaintiff's Complaint.

68. These Defendants deny the allegations contained in paragraph 68 of Plaintiff's Complaint.

**COUNT SEVEN**  
**Against Defendant Veruchi - Intentional Infliction of Emotional Distress**

69. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 69 of Count VII of Plaintiff's Complaint, as if fully re-written herein.

70. These Defendants deny the allegations contained in paragraph 70 of Plaintiff's Complaint.

71. These Defendants deny the allegations contained in paragraph 71 of Plaintiff's Complaint.

72. These Defendants deny the allegations contained in paragraph 72 of Plaintiff's Complaint.

73. These Defendants deny the allegations contained in paragraph 73 of Plaintiff's Complaint.



74. These Defendants deny the allegations contained in paragraph 74 of Plaintiff's Complaint.

**COUNT EIGHT**  
**Against City of Rockford -- Respondeat Superior**

75. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 75 of Count VIII of Plaintiff's Complaint, as if fully re-written herein.

76. These Defendants admit the allegations contained in paragraph 76 of Plaintiff's Complaint.

77. These Defendants deny the allegations contained in paragraph 77 of Plaintiff's Complaint.

**COUNT NINE**  
**Against City of Rockford – Indemnification**

78. These Defendants re-assert their responses to paragraphs 1-37 of Plaintiff's Complaint as their response to paragraph 78 of Count IX of Plaintiff's Complaint, as if fully re-written herein.

79. These Defendants deny the allegations contained in paragraph 79 of Plaintiff's Complaint.

80. These Defendants deny the allegations contained in paragraph 80 of Plaintiff's Complaint.

Dated: June 7, 2008

ROBERT VERUCHI and CITY OF ROCKFORD,  
Defendants,

By: /s/ Kerry F. Partridge  
Kerry F. Partridge, City Attorney

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